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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 RYTHER, ET AL.,

11 Plaintiffs,

12 v.

13 ALEJANDRO MAYORKAS, ET AL.,

14 Defendants.

CASE NO. 2:22-CV-01036-KJM-KJN

STIPULATION AND ORDER TO CHANGE
VENUE TO THE CENTRAL DISTRICT OF
CALIFORNIA

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16 The parties request that this matter be transferred from the Eastern District of California to the
17 Central District of California in the interests of justice and for the convenience of the parties and
18 witnesses pursuant to 28 U.S.C. § 1404(a). This case concerns a set of applications for immigration
19 benefits on behalf of Plaintiff Imsomboon. U.S. Citizenship and Immigration Services denied Plaintiffs'
20 immigration applications because it determined Plaintiff Imsomboon was statutorily barred pursuant to 8
21 U.S.C. § 1154(c) for having previously entered into a fraudulent marriage for the purpose of evading the
22 immigration laws. Plaintiffs now challenge that decision.
23

24 Venue is proper in, and a change of venue is appropriate to, the Central District of California:

- 25 1. Plaintiffs filed their applications with the USCIS San Bernardino Field Office, which is
26 within the Central District of California.
27 2. Within the Central District of California, the USCIS San Bernardino Field Office adjudicated
28 Plaintiffs' petition and application, interviewed Plaintiffs, and issued decisions denying the

petition and application.

3. The anticipated government witnesses and evidence are located in the Central District of California.

4. Plaintiffs reside in the Central District of California.

Plaintiffs maintain venue is also proper in the Eastern District of California for the below reasons, but stipulate and do not oppose a change of venue to the Central District of California:

1. Plaintiff Nok (Ratchanok Imsomboon) married her first husband in Stockton California, and he petitioned for her on July 29, 2013;

2. Plaintiff and her first husband were interviewed on July 29, 2013;

3. Immigration officers visited various addresses in Stockton California on or about August 4, 2014;

4. Immigration officers interviewed Plaintiffs first husband on or about August 4, 2014 in Stockton California;

5. Based on the interview with Plaintiffs first husband, immigration officers concluded that her first marriage was entered into for immigration purposes;

6. Plaintiff was thereafter divorced in Stockton Superior Court;

7. Plaintiffs were thereafter married and petitioned USCIS from their new residence on August 4, 2020 (Central District of California);

8. The petition was denied on May 4, 2020;

9. All the percipient witnesses reside in Stockton California

10. Plaintiffs now challenge the determination that Plaintiffs first marriage was entered into for immigration purposes.

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1 The parties therefore stipulate to a transfer of venue pursuant to 28 U.S.C. § 1404(a), and request that, in
2 the interest of justice, and for the convenience of the parties and witnesses, the Court transfer venue of
3 this case from the Eastern District of California to the Central District of California.

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5 Respectfully submitted,

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7 Dated: July 27, 2022

PHILLIP A. TALBERT
United States Attorney


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9 By: /s/ ELLIOT C. WONG
ELLIOT C. WONG
Assistant United States Attorney

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12 /s/ TERRY HUNT
TERRY HUNT
Counsel for Plaintiff

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15 ORDER

16 It is so ordered.

17 DATED: August 4, 2022.

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CHIEF UNITED STATES DISTRICT JUDGE